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November 9, 2018

**Via ECF and Electronic Mail**

Hon. Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
[Torres\\_NYSDChambers@nysd.uscourts.gov](mailto:Torres_NYSDChambers@nysd.uscourts.gov)

**Re: *Floyd v. City of New York*, 08 Civ. 1034 (AT)**

Dear Judge Torres:

On behalf of Plaintiffs in the above-entitled action currently before Your Honor, we write to notify the Court that, pursuant to the Court's February 3, 2015 Order Regarding Monitor's Final Recommendations (Dkt # 476), Plaintiffs intend to file on or before November 23, 2018, a partial objection to the Monitor's November 9, 2018 final recommendation regarding his proposal for the Court-ordered pilots on documentation of Level 1 and 2 encounters and body worn camera recordings of Level 1 encounters (Dkt ## 660, 660-1). *See* Dkt # 476 at 2 ("If a party does wish to object to a Final Recommendation, that party shall. . . within 14 days of receiving a final recommendation, submit a letter to the Court on ECF of no more than five single-spaced pages stating the grounds for the objection."). Plaintiffs' objections, which we previously raised with the Monitor in response to earlier drafts of his pilot proposal, concern those portions of the final pilot proposal that we and our social science experts believe are inconsistent with social science best practices and/or the intent of the Court's orders. Plaintiffs' objections will be based in large part on the input of our two experts, Professors Jeffrey Fagan of Columbia Law School and Jack Glaser of the University of California Berkeley, both of whom are traveling this week and, in Professor Fagan's case, through the beginning of next week. We have already informed the Monitor of our intention to file an objection.

Thank you for your time and consideration.

Respectfully submitted,

\s\Darius Charney  
Darius Charney  
CENTER FOR CONSTITUTIONAL RIGHTS

\s\Jonathan C. Moore  
Jonathan C. Moore  
Luna Droubi  
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*Attorneys for Plaintiffs*

cc: Peter Zimroth, Esq. and Counsel for All Parties (*via ECF*)